



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

Sent Via Email

October 27, 2008

Ms. Yvonne Meeks
Portfolio Manager – Site Remediation
Pacific Gas and Electric Company
4325 South Higuera Street
San Luis Obispo, CA 93401

CONDITIONAL CONCURRENCE ON AUGUST 29, 2008 FINAL SOIL AND SEDIMENT DATA USABILITY ASSESSMENT TECHNICAL MEMORANDUM FOR PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

Dear Ms. Meeks,

The Department of Toxic Substances Control (DTSC) has completed its review of the August 29, 2008 Final Soil and Sediment Data Usability Assessment Technical Memorandum (Final DUA Tech Memo). DTSC finds that PG&E has appropriately addressed our comments and concerns associated with the May 30, 2007 version of the DUA Tech Memo. DTSC notes that all necessary changes have been incorporated in the Final DUA Tech Memo.

DTSC is in general concurrence with the Final DUA Tech Memo except for the inserted footnote 1 on Page 3. That footnote should be struck from the Final DUA Tech Memo. DTSC is unclear of the meaning, intent, and purpose of this footnote. Without clarification, DTSC disagrees with the footnote that the **final** identification (emphasis added) of the Solid Waste Management Units (SWMUs), Areas of Concern (AOCs), and undesignated areas is documented in the Revised Final RFI/RI Report, Volume 1. PG&E's August 17, 2007 letter indicates that an Addendum to Volume 1 will be submitted to address any new SWMUs and AOCs identified during the current corrective action investigation including, but not limited to, the IM3 treatment facility and the MW-20 bench.

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DTSC would like to also reiterate that the boundaries of current SWMUs, AOCs and undesignated areas, as depicted in the final RFI/RI Volume 1, are approximate and may change as a result of site investigation. Furthermore, DTSC does not believe "undesignated area" to be a proper term used for identification of units under the Resource Conservation and Recovery Act or the Comprehensive Environmental Response, Compensation, and Liability Act. Although DTSC has not objected to the use of "undesignated areas" in the RFI/RI reports for the site, if additional action is required of any "undesignated area", DTSC will require PG&E to reclassify those units as SWMUs or AOCs for the purpose of the Corrective Measures Study/ Feasibility Study and final remedy selection.

If you have any questions regarding this letter, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aaron Yue', with a stylized flourish at the end.

Aaron Yue
Project Manager
Geology and Remediation Engineering

aky:100803A

cc: PG&E Topock Consultative Workgroup Members – Via e-mail
PG&E Topock Geo/Hydro Technical Workgroup Members – Via e-mail
Tribal Representatives in PG&E Contact List – Via e-mail